

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. MEDIATEK INC., ET AL., <i>Defendant.</i>	NO. 6:20-cv-01210-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. NVIDIA CORPORATION, <i>Defendant.</i>	NO. 6:20-cv-01211-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. NXP SEMICONDUCTORS NV, ET AL., <i>Defendant.</i>	NO. 6:20-cv-01212-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. RENESAS ELECTRONICS CORPORATION, ET AL., <i>Defendant.</i>	NO. 6:20-cv-01213-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. SILICON LABORATORIES INC., <i>Defendant.</i>	NO. 6:20-cv-01214-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. STMICROELECTRONICS INC., <i>Defendant.</i>	NO. 6:20-cv-01215-ADA
OCEAN SEMICONDUCTOR LLC, <i>Plaintiff,</i> vs. WESTERN DIGITAL TECHNOLOGIES, INC., <i>Defendant.</i>	NO. 6:20-cv-01216-ADA

**DEFENDANTS' DISCLOSURE OF
PRELIMINARY PROPOSED CONSTRUCTIONS**

Pursuant to the Court’s Scheduling Orders in the above-captioned cases, Defendants MediaTek Inc.; MediaTek USA Inc.; NVIDIA Corporation; NXP USA, Inc.; Renesas Electronics Corporation; Renesas Electronics America, Inc.; Silicon Laboratories Inc.; STMicroelectronics, Inc.; and Western Digital Technologies, Inc. (collectively “Defendants”) disclose their preliminary proposed constructions for terms identified by the parties. Defendants reserve the right to supplement or modify their preliminary proposed constructions, including in response to reviewing constructions proposed by Ocean Semiconductor and/or after meeting and conferring with Ocean Semiconductor regarding any proposed constructions.

Defendants submit this list collectively based on the Court’s Order Governing Proceedings, which requires defendants in coordinated cases to submit a single claim construction brief. But Ocean Semiconductor has not uniformly asserted the same patents and claims against each Defendant, and therefore not every term on this list can be attributed to each individual Defendant. Defendants intend to work together with one another and Ocean Semiconductor to narrow claim construction issues where possible, including reaching agreement on constructions. Defendants reserve the right to argue that a claim term not included below should have its plain and ordinary meaning or that such a term does not meet the requirements of 35 U.S.C. § 112. For any term addressed below, Defendants reserve the right to argue that such a term should be given its plain and ordinary meaning. To the extent that a dispute arises later regarding the plain and ordinary meaning of any term, Defendants reserve the right to raise such an issue with the Court once such a dispute has arisen.

U.S. PATENT NO. 6,660,651

Claim Term or Phrase	Claim Nos.	Construction
“process [chamber/operation]”	19-24, 31-32, 34-37, 72-75, 77-81	Plain and ordinary meaning

“pneumatic cylinder”	19-24, 75, and 81	Plain and ordinary meaning (however, to the extent Ocean Semiconductor also argues plain and ordinary meaning, Defendants request a meet and confer to discuss Ocean Semiconductor’s understanding of such plain and ordinary meaning)
“positioning a wafer on said wafer stage after said wafer stage has been adjusted”	20, 73, 78	Plain and ordinary meaning
“across-wafer variations produced by said process operation”	31-32, 34-37	Plain and ordinary meaning
“said process chamber”	31-32, 34-37	Indefinite
“performing said process operation on at least one subsequently processed wafer positioned on said wafer stage in said process chamber after said plane of said wafer stage has been adjusted”	31-32, 34-37	Plain and ordinary meaning

U.S. PATENT NOS. 6,907,305 AND 6,968,248

Claim Term or Phrase	Claim No.	Construction
“software scheduling agent”	1-5, 7-11 (’305 patent), 1-12 (’248 patent)	“a software agent that schedules, initiates, and executes activities on behalf of a single manufacturing domain entity”
“reactively scheduling”	1-5, 7-11 (’305 patent), 1-12 (’248 patent)	Plain and ordinary meaning
“notifying a software scheduling agent of the occurrence”	1-5, 7-11 (’305 patent), 1-12 (’248 patent)	Plain and ordinary meaning

U.S. PATENT NO. 6,725,402

Claim Term or Phrase	Claim No.	Construction
“determining if a fault condition exists with the	1-7	Plain and ordinary meaning

processing tool based upon the state data received by the fault detection unit”		
“operational state data”	1-7	Plain and ordinary meaning
“interface”	1-7	Plain and ordinary meaning
“translating the state data from a first communications protocol to a second communications protocol”	1-7	Plain and ordinary meaning
“advanced process control framework”	1-7	Plain and ordinary meaning
“sending an alarm signal”	1-7	Plain and ordinary meaning
“performing a predetermined action on the processing tool in response to the presence of a fault condition”	1-7	Plain and ordinary meaning

U.S. PATENT NO. 6,420,097

Claim Term or Phrase	Claim No.	Construction
“ultra thin resist layer[s]”	1-14, 17	Indefinite
“conventional”	1-14, 17	Plain and ordinary meaning
“isotropically”	1-14, 17	Plain and ordinary meaning

U.S. PATENT NO. 7,080,330

Claim Term or Phrase	Claim No.	Construction
“concurrently measuring”	19-21	“simultaneously measuring with a single measuring tool”
“grating structure”	19-21	Plain and ordinary meaning

U.S. PATENT NO. 6,836,691

Claim Term or Phrase	Claim No.	Construction
“collection purpose data”	1-9	Plain and ordinary meaning
“filtering the metrology data based on the collection purpose data”	1-9	Plain and ordinary meaning

U.S. PATENT NO. 8,676,538

Claim Term or Phrase	Claim No.	Construction
“adjusting in said computer a weighting of said parameter based upon said relationship of said parameter to said detected fault”	1-16	Plain and ordinary meaning
“performing in said computer the fault detection analysis relating to processing of a subsequent workpiece using said adjusted weighting”	1-16	Plain and ordinary meaning
“fault detection”	1-16	Plain and ordinary meaning
“a significant fault”	5	Indefinite
“determining in said computer whether said parameter is a significant factor”	7	Indefinite

U.S. PATENT NO. 8,120,170

Claim Term or Phrase	Claim No.	Construction
“package insulated circuit”	9	Indefinite

U.S. PATENT NO. 8,847,383

Claim Term or Phrase	Claim No.	Construction
“[the/a] substrate”	1	Indefinite

Dated: September 15, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on September 15, 2021, all counsel of record who have appeared in the above-captioned cases are being served with a copy of the foregoing by email.

/s/ Tyler R. Bowen